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*Attorneys for the State of Indiana*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:

RETRIEVAL-MASTERS CREDITORS BUREAU, INC.<sup>1</sup>,  
  
DEBTOR.

CHAPTER 11

CASE NO. 19-23185 (RDD)

**SECOND SUPPLEMENTAL STATEMENT IN SUPPORT OF STATE OF INDIANA'S  
MOTION TO CONVERT TO CHAPTER 7, OR IN THE ALTERNATIVE,  
APPOINT A CHAPTER 11 TRUSTEE**

Comes now the State of Indiana, by Indiana Attorney General Curtis T. Hill Jr., and Deputy Attorney General Heather Crockett, and hereby does file its *Supplemental Statements in Support of State of Indiana's Motion to Convert to Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee* (the "Motion to Convert"), and states as follows:

1. On July 10, 2019, the State of Indiana filed its Motion to Convert in this case. [Dkt. 52].
2. The Attorney General of Kentucky has provided the letter attached hereto in support of the State of Indiana's Motion to Convert.

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number is 9495. The location of the Debtor's service address for purposes of this chapter 11 case is 4 Westchester Plaza, Suite 110, Elmsford, NY 10523. The Debtor also does business as American Medical Collection Agency.

WHEREFORE, the State of Indiana respectfully submits the supplemental statements from the Attorney General of Kentucky for the Court's review and information.

Respectfully submitted,

CURTIS T. HILL, JR.  
Attorney General of Indiana  
Atty. No. 13999-20

By: /s/ Heather M. Crockett  
Heather M. Crockett, Atty. No. 26325-22  
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**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the foregoing *Supplemental Statements in Support of State of Indiana's Motion to Convert to Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee* has been duly served upon all counsel of record listed below, by ECF notification on July 16, 2019:

- Jordan Adler jordan.adler@ag.ny.gov
- Jessica Boelter jboelter@sidley.com, mlinder@sidley.com;emcdonnell@sidley.com
- Justin Clouser justin.clouser@atg.in.gov
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- William S. Sugden will.sugden@alston.com
- United States Trustee USTPRegion02.NYECF@USDOJ.GOV
- Steven Wilamowsky wilamowsky@chapman.com
- Tom Zimmerman tom@attorneyzim.com, firm@attorneyzim.com

By: /s/ Heather M. Crockett  
Heather M. Crockett  
Deputy Attorney General



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July 15, 2019

Heather M. Crockett, Deputy Attorney General  
Justin Clouser, Deputy Attorney General  
Indiana Office of the Attorney General  
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RE: Indiana Attorney General's *Motion to Convert Case to Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee*, In re: RETRIEVAL-MASTERS CREDITORS BUREAU, INC.<sup>1</sup>, Case No. 19-23185 (RDD), United States Bankruptcy Court, Southern District of New York

Dear Deputy Attorneys General Crockett and Clouser:

We are in receipt of the Indiana Attorney General's motion, which was filed in the bankruptcy case on July 10, 2019 in the above captioned case (the "Motion to Convert").


We have carefully reviewed the Motion to Convert and fully support it. You are expressly authorized and encouraged to share this letter with the Honorable Robert D. Drain, U.S. Bankruptcy Judge for the Southern District of New York, who is presiding over this case.

Thank you for your assistance.

Respectfully submitted,

ANDY BESHEAR, ATTORNEY GENERAL

/kw

/s/ Kevin R. Winstead   
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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 9495. The location of the Debtor's service address for purposes of this chapter 11 case is 4 Westchester Plaza, Suite 110, Elmsford, NY 10523. The Debtor also does business as American Medical Collection Agency.